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Attorneys for Defendants  
AMERICAN GENERAL LIFE INSURANCE  
COMPANY; EQUITABLE FINANCIAL LIFE  
INSURANCE COMPANY OF AMERICA; PACIFIC  
LIFE INSURANCE COMPANY; PHL VARIABLE  
INSURANCE COMPANY; THE PENN MUTUAL  
LIFE INSURANCE COMPANY; and RELIASTAR  
LIFE INSURANCE COMPANY

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

GWENDALYN DOUGLASS, as  
Trustee of RAYMOND E. DOUGLASS  
Revocable Trust,

Plaintiff,

v.

RELIANT LIFE SHARES LLC, et al.,  
Defendants.

Case No. 2:23-cv-00460

**STIPULATION TO EXTEND TIME  
TO RESPOND TO INITIAL  
COMPLAINT BY NOT MORE THAN  
30 DAYS (L.R. 8-3)**

Compl. filed: December 5, 2022  
FAC filed: December 27, 2022  
Date removed: January 20, 2023  
Current response date: January 27, 2023  
New response date: February 24, 2023

Pursuant to Central District of California Local Rule 8-3, Plaintiff and Defendants American General Life Insurance Company, improperly named, on information and belief, as “General American Life Insurance Company;” Equitable Financial Life Insurance Company of America, improperly named AXA Equitable Life Insurance Company; Pacific Life Insurance Company; PHL Variable Insurance Company; The Penn Mutual Life Insurance Company; and ReliaStar Life Insurance Company (collectively, “Defendants”) hereby stipulate and agree that Defendants shall have up to and including February 24, 2023 to move or plead in response to the First Amended Complaint.

**SO STIPULATED.**

Dated: January 23, 2023

MCDOWELL HETHERINGTON LLP

By: /s/ Colleen T. Flaherty  
Colleen T. Flaherty

Attorney for Defendants  
AMERICAN GENERAL LIFE  
INSURANCE COMPANY;  
EQUITABLE FINANCIAL LIFE  
INSURANCE COMPANY OF  
AMERICA; PACIFIC LIFE  
INSURANCE COMPANY; PHL  
VARIABLE INSURANCE  
COMPANY; THE PENN MUTUAL  
LIFE INSURANCE COMPANY; and  
RELIASTAR LIFE INSURANCE  
COMPANY

Dated: January 23, 2023

MURRIN LAW FIRM

By: /s/ J. Owen Murrin  
J. Owen Murrin

Attorneys for Plaintiff  
GWENDALYN DOUGLASS, as  
Trustee of RAYMOND E. DOUGLASS  
Revocable Trust

**ECF ATTESTATION**

I, Colleen T. Flaherty, am the ECF User whose ID and password are being used to file this **STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)**. In accordance with Local Rule 5-4.3.4, concurrence in and authorization of the filing of this document has been obtained from J. Owen Murrin, counsel for Plaintiff, and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

Dated: January 23, 2023

MCDOWELL HETHERINGTON LLP

By: /s/ Colleen T. Flaherty  
Colleen T. Flaherty

Attorney for Defendants